

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEDRIC CRAWFORD

Plaintiff,

v.

CITY OF BAYTOWN, KEITH

DOUGHERTY, TEDDY

SIMS, AND OFFICER DOE.

Defendant.

§
§
§
§
§
§
§
§
§

Civil Action No. 4:20-cv-03003

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

The City of Baytown (“City” or “Baytown”), files this Agreed Motion for Entry of Protective Order and for same would show as follows:

I.

The Parties in this matter have agreed to the terms of a protective order for certain confidential documents and evidence in this matter and have memorialized that agreement in the form of an agreed protective order. That agreed protective order is being filed as a proposed order to this motion. The parties would request that the agreed protective order being filed with this motion be signed and entered in this case.

Respectfully submitted,

/s/ Steven D. Selbe

STEVEN D. SELBE

ATTORNEY IN CHARGE

So. Dist. No.: 18003

SBN: 18004600

sselbe@grsm.com

Heidi J. Gumienny

State Bar No. 24036696

hgumienny@grsm.com

**ATTORNEYS FOR DEFENDANT,
THE CITY OF BAYTOWN**

OF COUNSEL:

GORDON REES SCULLY MANSUKHANI LLP

1900 West Loop South, Suite 1000

Houston, TX 77027

Telephone: (713) 961-3366

Facsimile: (713) 961-3938

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on the 8th day of October, 2020, and is available for viewing and downloading from the ECF system. Notice of Electronic Case Filing has been sent automatically to all parties listed in the Service List in effect on the date of electronic filing, which constitutes service of same, and satisfies the requirements of Fed. R. Civ. P. 5(b)(2)(D).

/s/ Steven D. Selbe

STEVEN D. SELBE